

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
MARK SAUNDERS	:	VIOLATION:
		18 U.S.C. § 1956(a)(3)
	:	(laundering of monetary instruments - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Defendant **MARK SAUNDERS** was employed as the manager of Quickie Check Cashing, located at 7106 Germantown Avenue, Philadelphia and Ace Check Cashing, located at 124 Cheltenham Avenue, Philadelphia, both check cashing facilities and Western Union ("W.U.") money transfer centers offering domestic and international money transmitting services to the public.
2. Defendant **MARK SAUNDERS** was a licensed money transmitter for Western Union, and his facilities being licensed in the Commonwealth of Pennsylvania. Western Union has more than 22,000 money transfer locations throughout the United States and they are required to comply with the anti-money laundering and currency reporting requirements of the Bank Secrecy Act, 31 U.S.C. § 5311, et. seq.

3. Western Union provides training to each of their agents on the money laundering laws and currency reporting requirements. This company provides manuals and updates to all of its agents, specifically advising agents as to the laws regarding illegal money laundering, the sanctions for illegal money laundering, and the requirements for reporting suspicious transactions.

4. Defendant **MARK SAUNDERS** conducted financial transactions, which were represented to him by an undercover law enforcement officer to be the proceeds of illegal drug trafficking, as defined in Title 21, United States Code, Section 841. Specifically, with regard to these funds, defendant **SAUNDERS** transferred money out-of-state and structured the transactions to evade and defeat the currency transaction reporting requirements. He also permitted the use of false identification and fictitious names to prevent discovery of the senders's true identity and to evade the reporting requirements.

5. On or about the dates listed in the chart below, in the Eastern District of Pennsylvania, defendant

MARK SAUNDERS

knowingly conducted the following financial transactions affecting interstate commerce:

Transaction	Date	Amount Laundered	WU Fees	Defendant's Commission
1	10/2/02	\$25,000	\$1,120	\$380
2	10/28/02	\$50,000	\$2,188	\$1,480
3	11/11/02	\$48,000	\$2,148	\$1,352
4	1/8/03	\$48,000	\$2,148	\$1,352
TOTAL:		\$171,000	\$7,604	\$4,564

6. When conducting the financial transactions described in paragraph five above, defendant **SAUNDERS** acted with the intent to conceal and disguise the nature, location, source, ownership and control of what he believed were the proceeds of specified unlawful activity, and with the intent to promote the carrying on of such specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(3).

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY